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July 22, 2025

By ECF

The Honorable Paul A. Engelmayer
United States District Judge
United States District Court for the
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell*, 20-CR-330 (PAE)

Dear Judge Engelmayer:

We respectfully submit this letter in connection with our representation of Ghislaine Maxwell in the above-referenced case.

Earlier today, the Court issued an Order directing the Government to file a supplemental memorandum, no later than Tuesday, July 29, 2025, addressing specific factors relevant to the Government's application to unseal grand jury transcripts in this case. (Dkt. 789). Additionally, the Court ordered the Government to provide the Court with the grand jury transcripts that the Government seeks to unseal by July 29, 2025, for the Court's review. *Id.* at 3.

As counsel for Ms. Maxwell, we would similarly like to review the grand jury transcripts at issue (we have not seen them and our understanding is that they have never been provided to the defense in their entirety) in order to craft a response and set out our position to the Court. We have discussed our request to review the grand jury transcripts with Deputy Attorney General Todd Blanche, and he has no objection to our application.

Thank you for your consideration in this matter.

Respectfully submitted,

/s/ David Oscar Markus
David Oscar Markus
Melissa Madrigal

MARKUS/MOSS PLLC

40 NW 3rd Street, PH 1
Miami, FL 33128
T 305 379-6667
F 305 379-6668
markuslaw.com